

From: (b) (6)
To: [ENRD.PUBCOMMENT-EES \(ENRD\)](#)
Cc: (b) (6)
Subject: (b) (6) Comment #2 to Department of Justice
Date: Tuesday, April 17, 2018 3:31:57 PM

To: Assistant Attorney General, Environment and Natural Resources Division

Regarding: United States of America v. Placer Mining Company, Inc. (dba New Bunker Hill Mining Co.) and Robert Hopper, Jr., D.J. Ref. No. 90-11-3-128/3.

Proof of Financial Assurance:

I am concerned about EPA's new plan to eliminate the 2016 rule requiring hard-rock-mining operations, such as gold, silver, and lead mines, to provide evidence that they had the financial resources to clean up any pollution that they created. Even if this were to happen, the Settlement Agreement must continue to require proof of financial assurance that documents that funds are available to complete all cleanup commitments.

This language should stand or be improved to assure that liability insurance will address correction of all future activities of the Purchaser:

"Not later than 15 days before commencing any Work to be Performed on-site under this Settlement Agreement, Purchaser shall secure, and shall maintain, commercial general liability insurance with limits of two million dollars, for any one occurrence, naming the United States as an additional insured with respect to all liability arising out of the activities performed by or on behalf of Purchaser pursuant to this Settlement Agreement."

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